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Honorable Joseph F. Bianco  
United States District Judge  
Eastern District of New York  
United States Courthouse  
100 Federal Plaza  
Central Islip, New York

BY ECF

Re: United States v. Kenner & Constantine  
13 Cr. 607 (JFB)

Dear Judge Bianco:

Defendant Tommy Constantine ("Constantine") and *Pro Se* co-defendant Philip Kenner ("Kenner") respectfully submit this joint letter for another extension of the due date of their oppositions to the government's Forfeiture Motion to approximately forty-five days from today. The forensic account assigned to both defendants is currently conducting his examination of the data. He anticipates completion in about 30 days. Additionally, he has been unavailable to go the MDC to meet with Kenner until next week. The government, by Assistant United States Attorney Diane Leonardo, consents to this application so long as the government's reply deadline is proportionately extended.

Thank you for Your Honor's consideration of this request.

Very truly yours,

*Sanford Talkin*  
Sanford Talkin

cc: AUSA Diane Leonardo (by ECF)  
AUSA Madeline O'Connor (by ECF)  
AUSA Saritha Komatireddy (by ECF)  
AUSA Matthew Haggans (by ECF)  
Philip Kenner (by hand)